

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 21-mj-30590

v.

MICHAEL PACTELES,

Defendant.

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**STIPULATION TO CONTINUE PRELIMINARY EXAMINATION AND
COMPLAINT**

By and through their respective counsel, **THE PARTIES STIPULATE** and agree that there is good cause to continue the preliminary examination and complaint from June 17, 2022 to July 22, 2022.

IT IS FURTHER STIPULATED that the time period from June 17, 2022, through and including July 22, 2022, shall be deemed excludable delay under the provisions of the Speedy Trial Act, Title 18, United States Code, Section 3161, in consideration of Section 3161(h)(7)(A), that the ends of justice served by continuing the preliminary examination and complaint outweigh the best interests of the public and Defendants in a speedy trial.

The parties stipulate and agree that an ends of justice continuance is appropriate for the following reasons:

1. On December 17, 2021, Defendant Michael Pacteles made his initial appearance on a criminal complaint, which charges him with federal programs bribery. He requested and received court-appointed counsel. He was eventually released on bond.

2. The parties previously agreed to adjourn the preliminary examination for approximately to allow the government to provide defense counsel with pre-indictment discovery materials, to allow defense counsel and Defendant to review these materials and the criminal charges, and to allow defense counsel and the government to discuss the same with government counsel, e.g., to determine whether there could be any pre-indictment resolution.

3. The government and defense counsel have engaged and continue to engage in plea negotiations. The parties seek an adjournment to have further discussions and negotiations in an attempt to reach a resolution, and ask for an adjournment to July 22, 2022 to allow this to occur.

4. The parties agree that the ends of justice served by continuing the preliminary examination and complaint outweigh the best interests of the public and Defendant in a speedy trial.

5. The parties also stipulate and agree that this stipulation and any order resulting therefrom shall not affect any previous order of pretrial detention or pretrial release.

Accordingly, the parties request that the Court find that, under the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), the period of delay, as a result of the continuance, shall be excluded in computing the time within which the information or indictment must be filed.

So stipulated:

s/Steven P. Cares
Assistant U.S. Attorney
211 W. Fort Street, Ste. 2001
Detroit, MI 48226
(313) 226-9139
Steven.Cares@usdoj.gov

s/David C. Tholen (w/ consent)
Attorney for Defendant
613 Abbott Street, Suite 500
Detroit, MI 48226
(313) 967-5542
david_tholen@fd.org

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**ORDER TO CONTINUE PRELIMINARY EXAMINATION AND
COMPLAINT**

The Court, having been fully advised by the respective parties, states as follows:

IT IS ORDERED that the preliminary examination and complaint is continued from June 17, 2022 to July 22, 2022 at 1:00PM.

IF IS FURTHER ORDERED that the time period from June 17, 2022, through and including July 22, 2022, shall be deemed excludable delay under the provisions of the Speedy Trial Act, Title 18, United States Code, Section 3161, in consideration of Section 3161(h)(7)(A) for the reasons set forth in the parties' stipulation, which is incorporated by reference—including to allow parties to discuss pre-indictment resolution—and, that the ends of justice served by continuing the

preliminary examination and complaint outweigh the best interests of the public and Defendant in a speedy trial.

This order shall not affect any previous order of pretrial detention or pretrial release.

Accordingly, the Court shall find that, under the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(7)(A), the period of delay, as a result of the continuance, shall be excluded in computing the time within which the information or indictment must be filed.

IT IS SO ORDERED.

s/Kimberly G. Altman
KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date Entered: June 13, 2022